

## Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

**Part I Reporting Issuer**

<b>1</b> Issuer's name		<b>2</b> Issuer's employer identification number (EIN)	
FIRSTSERVICE CORPORATION		98-1099437	
<b>3</b> Name of contact for additional information	<b>4</b> Telephone No. of contact	<b>5</b> Email address of contact	
NEIL D. CHANDER	416-324-4301	NCHANDER@FIRSTSERVICE.COM	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact		<b>7</b> City, town, or post office, state, and Zip code of contact	
1140 BAY STREET, SUITE 4000		TORONTO, ONTARIO, CANADA M5S 2B4	
<b>8</b> Date of action		<b>9</b> Classification and description	
JUNE 1, 2015		SUBORDINATE VOTING AND MULTIPLE VOTING STOCK OF FIRSTSERVICE	
<b>10</b> CUSIP number	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol	<b>13</b> Account number(s)
		FSV	

**Part II Organizational Action** Attach additional statements if needed. See back of form for additional questions.

**14** Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶ ON JUNE 1, 2015, FIRSTSERVICE CORPORATION EXCHANGED ALL OF THE SUBORDINATE VOTING SHARES (SV) AND MULTIPLE VOTING SHARES (MV) OF ITS CAPITAL OUTSTANDING OWNED BY SHAREHOLDERS AS FOLLOWS:

- EACH SV SHARE WAS EXCHANGED FOR ONE NEW SV SHARE AND ONE SV SPECIAL SHARE OF FIRSTSERVICE CORPORATION

- EACH MV SHARE WAS EXCHANGED FOR ONE NEW MV SHARE AND ONE MV SPECIAL SHARE OF FIRSTSERVICE CORPORATION

- THE ORIGINAL MV AND SV SHARES WERE CANCELLED.

IMMEDIATELY THEREAFTER, EACH SV SHAREHOLDER TRANSFERRED ALL OF THE SV SPECIAL SHARES OWNED TO A NEWLY INCORPORATED CANADIAN COMPANY, "NEWCO FSC" IN EXCHANGE FOR SV SHARES OF NEWCO FSC. SIMILARLY, EACH MV SHAREHOLDER TRANSFERRED ALL OF THE MV SPECIAL SHARES OWNED TO NEWCO FSC IN EXCHANGE FOR MV SHARES OF NEWCO FSC.

FIRSTSERVICE CORPORATION CHANGED ITS NAME TO "COLLIERS INTERNATIONAL" AND NEWCO FSC CHANGED ITS NAME TO FIRSTSERVICE CORPORATION (HEREINAFTER NAMED "FSC")

**15** Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶

THE U.S. SHAREHOLDER'S FORMER TAX BASIS IN THE FSC SHARES WILL BE ALLOCATED BETWEEN THE COLLIERS INTERNATIONAL SHARES AND THE FSC SHARES RECEIVED IN THE EXCHANGE IN PROPORTION TO THEIR RESPECTIVE FAIR MARKET VALUES ON MAY 29, 2015.

SHAREHOLDER'S HOLDING PERIOD OF THE NEW FSC SHARES RECEIVED WILL INCLUDE THE HOLDING PERIOD OF THE FORMER FSC SHARES.

**16** Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶

THE BASIS OF THE FORMER FSC SHARES HELD BY U.S. SHAREHOLDERS (NOW THE COLLIERS INTERNATIONAL SHARES) WILL BE REDUCED BY THE FOLLOWING FORMULA: FMV OF NEW FSC/(FMV OF NEW FSC + FMV OF COLLIERS INTERNATIONAL) X BASIS

THE FMV OF NEW FSC ON MAY 29, 2015 = 41.43% X 65.38 = \$27.09; THE FMV OF COLLIERS ON MAY 29, 2015 = \$65.38-27.09 = \$38.29

THE BASIS OF THE NEW SPECIAL SHARE WILL BE EQUAL TO THE U.S. SHAREHOLDER'S TAX BASIS LESS THE AMOUNT DETERMINED ABOVE.

THEREFORE, A TAXPAYER'S BASIS IN FSC STOCK AND COLLIERS INTERNATIONAL STOCK SHOULD BE CALCULATED AS FOLLOWS:

FSC - 41.43% X TAXPAYER'S ORIGINAL BASIS IN FIRSTSERVICE STOCK BEFORE THE EXCHANGE

COLLIERS INTERNATIONAL - 58.57% X TAXPAYER'S ORIGINAL BASIS IN FIRSTSERVICE STOCK BEFORE THE EXCHANGE

**Part II Organizational Action** (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ \_\_\_\_\_

(1) IRC SECTION 355 - QUALIFIED FOR NON-RECOGNITION TREATMENT

(2) TREAS. REG. SECTION 1.358-2: THE SUM OF THE TAX BASIS OF NEW FSC SHARES AND NEW COLLIERS INTERNATIONAL SHARES IN AGGREGATE WILL BE THE SAME AS THE ORIGINAL FIRSTSERVICE SHARES, ALLOCATED IN THE SAME MANNER AS DESCRIBED IN TREASURY REGULATION SECTION 1.358-2

18 Can any resulting loss be recognized? ▶ \_\_\_\_\_

NO

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ \_\_\_\_\_

THE REPORTABLE YEAR IS DECEMBER 31, 2015

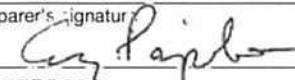
Sign Here

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ▶  Date ▶ 2015/07/07

Print your name ▶ JOHN FRIEDRICHSEN Title ▶ CFO

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input checked="" type="checkbox"/> if self-employed	PTIN
GREGORY J. PAPINKO		2015/07/07		P01452981
Firm's name ▶ PRICEWATERHOUSECOOPERS LLP			Firm's EIN ▶	98-0189320
Firm's address ▶ 18 YORK STREET, SUITE 2600, TORONTO, ON CANADA M5J 0B2			Phone no.	416-863-1133